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Subject: PRP Search Enforcement timeline (08/29/14 and ends 03/06/15) for CES Environmental Services, Inc.- Houston

Date: 09/16/14

**08/29/14**

From TCEQ received names and addresses of approximately 200 entities. Named entities reported to TCEQ that, during 2009 and 2010, they had shipped, generated, and or arranged for shipments of hazardous and non-hazardous wastes to the CES Houston facility.

**First wave – Combination 104(e) Information Requests & General Notice Letters**

**09/02/14 thru 10/10/14**

**29 work days**

- Match TCEQ provided named entities with TCEQ's record of self-reported information from transporters, generators, and/or arrangers with self-reported 1-digit classifications coded "H" (H = hazardous per TX Waste Code).
- Obtain from TCEQ a list of names to match generator codes that appear on TCEQ's record of self-reported information from transporters, generators, and/or arrangers for years 2009 and 2010.
- Prepare combination 104(e) Information Requests / General Notice letters (COMBOL) entities listed on TCEQ's record of self-reported information from transporters, generators, and/or arrangers with self-reported 1-digit classifications coded "H."
- Obtain concurrences in eRouting for COMBOL that will apply to all entities.
- Prepare and make ready first of possibly two AOCs.

**10/14/14 thru 10/31/14**

**14 work days**

- Merge named entities (those with TX waste code "H") with approved COMBOL.
- Issue COMBOLs (allow 15 day response time for the GNL part and 30 day response time with probability of 60 day response time for the 104(e) Information Request).

**11/03/14 thru 11/07/14**

**5 work days**

- Allowance for receipt of issued 104(e) letters and COMBOLs

**11/10/14 thru 11/21/14**

**9 work days**

- Planned period to receive GN responses.

**11/24/14 thru 01/30/15**

**46 work days**

- Review / analyze all GN responses.
- Review / analyze 104(e) responses.
- Negotiate with applicable PRPs.

**02/02/15 thru 02/13/15**

**14 work days**

- Obtain signatures on first of possibly two AOCs with initial group of PRPs agreeable to participate in the removal action.

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## **Second Wave - Combination 104(e) Information Requests & General Notice Letters**

**09/02/14 thru 10/15/14**

**33 work days**

- Contractor's Conversion of TIFF files on CDs to searchable PDF files.

**10/16/14 thru 11/07/14**

**18 work days**

- If necessary, modify already approved 104(e) Information Requests and COMBOLs future merging of named addressees.
- Review/search PDF files on CDs for "hazardous waste manifests," and any other information that identify entities with potential designation as transporters/generators/arrangers.
- From completed review/search, prepare list of potential transporters/generators/arrangers. For each identified entity the list will include entity's name and address, related manifest tracking #s with TX & Federal waste codes, waste descriptions, and waste quantities **and** any other identified information that documents or indicates movements of hazardous substances by the entity.
- Establish criteria for selection of identified entities to receive 104(e) Information Requests.
- Establish criteria for selection of identified entities to receive 104(e) Information Requests / General Notice letters (COMBOL).
- Identify entities that should receive 104(e) Information Requests.
- Identify entities that should receive 104(e) Information Requests / General Notice letters (COMBOL).
- Merge selected named entities into already approved 104(e) Information Requests.
- Merge selected named entities into already approved COMBOL.
- Issue 104(e) letters (allow 30 day response time with probability of 60 day response time).
- Issue COMBOLs (allow 15 day response time for the GNL part and 30 day response time with probability of 60 day response time for the 104(e) Information Request).

**11/10/14 thru 11/14/17**

**4 work days**

- Allowance for receipt of issued 104(e) letters and COMBOLs.

**11/17/14 thru 12/08/14**

**15 work days**

- Planned period to receive responses.

**12/09/14 thru 02/13/15**

**46 work days**

- Review / analyze all responses.
- Review / analyze 104(e) responses.
- Negotiate with applicable PRPs.

**02/17/15 thru 03/06/15**

**14 work days**

- Obtain signatures on second AOC with all PRPs agreeable to participate in the removal action.
- Timeline does not provide for possible Federal Register publication)

**At this time there is no consideration for a UAO**